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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASON KEITH BRUCE,

Defendant.

Case No.: 2:23-cr-00080-JAM-2

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT;
ORDER**

Date: August 1, 2023
Time: 9:00 a.m.
Judge: Hon. John A. Mendez

STIPULATION

1. By previous order, this matter was set for status on August 1, 2023.
2. By this stipulation, defendant Jason Bruce now moves to continue the status conference until **October 17, 2023, at 09:00 a.m.**, and to exclude time between August 1, 2023 and October 17, 2023, at 9:00 a.m., under Local Code T4. Defendant Jason Bruce and Defendant Pir Danish Ali were indicted on March 23, 2023. Defendant Ali remains outside the United States and has not yet been arrested or arraigned.
3. Bruce and the government agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 82,841 pages of reports, video and audio recordings, emails, photographs, and other material. In addition, digital device extractions will be produced in discovery and made available for inspection. U.S. Fish and

Wildlife Service also has physical evidence available for inspection. Some of this discovery has already been produced and the remainder will be produced directly to defense counsel for Bruce this week.

- b) Counsel for the defendant desires additional time to review the discovery, counsel with his client, conduct investigation and research related to the criminal charges, and otherwise prepare for trial.
- c) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
- d) The government does not object to the continuance.
- e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 1, 2023 to October 17, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

DATED: July 21, 2023

PHILIP A. TALBERT
United States Attorney

1 /s/ KATHERINE T. LYDON

2 KATHERINE T. LYDON

3 Assistant U.S. Attorney

4 DATE: July 21, 2023

5 /s/ Thomas A. Johnson

6 THOMAS A. JOHNSON

7 Attorney for Jason Bruce

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12 **ORDER**

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14 **IT IS SO FOUND AND ORDERED.**

15 Dated: July 24, 2023

16 /s/ John A. Mendez

17 THE HONORABLE JOHN A. MENDEZ

18 SENIOR UNITED STATES DISTRICT JUDGE